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February 16<sup>th</sup> 2016

**Via Electronic Comment Filing System**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: CallFire Inc  
CPNI Compliance Certification  
EB Docket No. 06-36**

DOCKET FILE COPY ORIGINAL

Dear Ms. Dortch:

On behalf of CallFire.com and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the company's 2016 CPNI Certification.

This filing is made by CallFire.com, Inc. (ID- 829923).

Sincerely,

A handwritten signature in black ink, appearing to read "Jagannathan", written over a horizontal line.

Jagannathan Thinakaran

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB**  
**Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2016 covering prior calendar year 2015.

1. Date filed: February 16<sup>th</sup> 2016
2. Name of company(s) covered in this certification: CallFire Inc.
3. Form 499 Filer ID: 829923
4. Title of signatory: Jagannathan Thinakaran
5. Title of signatory: Co-Founder and Chief Operating Officer
6. Certification:

I, Jagannathan Thinakaran, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CNPI rules. *See 47 C.F.R § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken action (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: \_\_\_\_\_

Attachment: Accompanying Statement Explaining CPNI Procedures



February 16<sup>th</sup> 2016

CallFire Inc. (CallFire) in accordance with Section 64.2009(e), submits this statement summarizing how the CallFire operating procedures are designed to ensure compliance with the Commission's CPNI rules. CallFire provides an intelligent telecommunication application to its customers, which allows users to send broadcasted voice and SMS messages, create inbound number configurations via IVR or call-forwarding, and make live outbound calls using a cloud based power dialer. This statement summarizes the procedures that CallFire has implanted to safeguard the CPNI of customers.

**Password Protecting Customer Information:**

CallFire.com values its customers' privacy and takes measure to protect CPNI, and requires customers to stipulate a password in order to access any and all telecommunication tools. This data is housed in CallFire's secure datacenter.

It is CallFire's policy to protect the confidentiality of customers' information. CallFire does not use, disclose, or permit access to its customers' CPNI except as such use, disclosure or access is permitted under Section 222 of the Communications Act of 1934, as amended, and the Commissions implementing rules.

As necessary, CallFire may use CPNI for the permissible purposes enumerated in the Act and the Commission's rules, including, but not limited to, initiating, rendering, billing, and collecting for telecommunications services. CallFire may also use CPNI to protect its rights or property.

**CPNI Training and Compliance:**

Employees of CallFire.com are trained to strictly enforce the company's Privacy Policy. A complete version of CallFire's Privacy Policy can be found at <http://www.callfire.com/legal/privacy>.

In the prior year, CallFire.com has not had any instances where customer information was disclosed without consent. In addition, no complaints have been filed for violating CPNI compliance in 2015.

CallFire has in place a process for verifying its customers' identity during an inbound call, and does not release call detail information during an inbound call.



Instead, the customer will be guided through a process of accessing the data themselves, only after logging into the secure password-protected account. CallFire trains its personnel in the use of CPNI and has an express disciplinary process in place for violations of CallFire's CPNI policy.

**Using Customer Information for Marketing:**

CallFire does not use CPNI for marketing products or services to customers outside of the service to which the customer already subscribes. CallFire does not share CPNI with affiliates or third parties for marketing purposes. If, in the future, CallFire seeks to use CPNI for these purposes, it will provide the appropriate notice to its customers and will maintain a list of customer preferences. CallFire will maintain a record of any marketing campaign in accordance with the Commission's rules.

**Conclusion:**

CallFire takes reasonable measure to discover and protect against attempts to gain against unauthorized access to CPNI. CallFire has practices and procedure in place to notify law enforcement and customers, if permitted, of a security breach that results in the unauthorized access to, use or disclosure of CPNI. CallFire will maintain a record of the notification in accordance with the Commission's rules.

CallFire has designated an officer, as an agent for the company, to sign and file a CPNI compliance certificate on an annual basis.